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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing business  
as “Sage Memorial Hospital”); an Arizona non-  
profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company (doing  
business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
EXTEND TIME FOR  
DEFENDANTS TO ANSWER  
PLAINTIFF’S THIRD AMENDED  
COMPLAINT [ECF NO. 192]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-1 and subject to this Court’s approval, that Defendants Razaghi Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an extension of time up to and including **March 31, 2023** (45 day extension) to respond to Plaintiff’s Third Amended Complaint (ECF No. 192) filed on May 20, 2022. On January

30, 2023, the Court recently issued its Ruling on Defendants' Motion to Dismiss the Third Amended Complaint (ECF No. 232), partially granting said motion and triggering the deadline for response to the remaining claims to February 13, 2023.

The parties stipulate that there is good cause for the requested extension due to defense counsels' current case load including Mr. Uppal's upcoming trial in another matter, Defendants' availability to assist in preparing the response, the other currently pending deadlines in this matter, and in consideration of the volume and complexity of the issues in this case. Of note, the Third Amended Complaint is 132 pages, with 278 numbered paragraphs plus an additional 80 pages of subparts. Due to the reasons stated herein, Defendants require additional time to prepare their response thereto. This is the first request to extend Defendants' deadline to respond to the Third Amended Complaint following the Court's Ruling on the Motion to Dismiss (ECF No. 232).

This request is made in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested extension.

For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Defendants up to and including **March 31, 2023** to respond to or otherwise answer the Third Amended Complaint (ECF No. 192).

RESPECTFULLY SUBMITTED this 8th day of February 2023.

/s/ Paul S. Padda (with permission)  
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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: February 9, 2023